

Before the  
Federal Communications Commission  
Washington DC 20554

In the Matter of:	)	
	)	
Creation of a Low	)	MM Docket 99-25
Power Radio Service	)	
	)	
	)	

Second order on Reconsideration and  
Further Notice of Proposed Rulemaking

Reply Comments of  
Edward A. Schober

To Comments of:  
Colquitt Community Radio, Inc.  
Nicholas Leggett and  
Anthony Gray

The following are reply comments of Edward A. Schober, a licensee of an FM translator, holder of two additional construction permits for FM translators and applicant for several additional translators in New Jersey, Pennsylvania and New York. These comments are in relation the addition of issues concerning the relationship of the FM translator service and the LPFM service.

The commentators have expressed the view that LPFM service should have priority over the FM Translator service, instead of the present co-equal status. I disagree with this proposal, since an applicant for an LPFM station would then be able to cause an FM translator that is providing service to an area lose that service. It is bad enough that LPFM stations and FM translators can be superseded by improvements in full power stations, but to put FM translators at the "bottom of the heap" after the licensees have made good faith applications, and expended substantial funds to construct the station is unfair. Additionally, translators are applied for and operated for a reason - to bring the signals of a desired station into an area. This may be the only source of specific programming like classical music or jazz in an area.

If there is overwhelming demand for local programming from an LPFM station, I have a much superior alternative: Permit FM Translators to be converted to LPFM stations. If local programming in an area is desirable enough, permit FM translators to be sold to local organizations to operate them as LPFM Stations.

There are now 3,300 construction permits and recent licenses for FM translators, as well as 3,500 licensed FM translators. If there is adequate demand, then there could be nearly 7,000 more local voices virtually overnight. I understand that many of the FM translators serve rural areas that may not support an LPFM station, so perhaps only 1/3 of the authorized FM translators are in areas where there would be adequate support for an LPFM station. If half of these translators were converted to LPFM stations, then the total number of authorized LPFM stations would more than double!

In the case that there is greater demand for an FM translator in an area than the demand for an LPFM, then no conversion would take place. In the case of greater demand for LPFM, then the FM translator would be converted to an LPFM. Market forces would rule.

In any area where FM translators operate, the need for localism is present. In areas that are too rural to support an LPFM station, or where there is inadequate demand for LPFM service, FM translators should be permitted to provide "breakaway" programming, with the permission of the primary station. This breakaway programming should be expressly local to the service area of the translator - Local weather, news, emergency announcements, local sports, public affairs, local concerts, etc. This change would substantially improve the public service benefit of FM Translators. This local programming of a small portion of an FM translator's operating hours would greatly facilitate the goals of the Commission in enhancing localism.

Respectfully submitted,

A handwritten signature in blue ink that reads "Ted Schober". The signature is written in a cursive, slightly slanted style.

Edward A. Schober